1	Bill Robins III, Esq. (SBN 296101) Robert T. Bryson, Esq. (SBN 156953) Rex Grady, Esq. (SBN 232236) ROBINS CLOUD LLP 808 Wilshire Blvd., Suite 450 Santa Monica, California 90401 Telephone: (310) 929-4200	
2		
3		
4	Facsimile: (310) 566-5900	
5	Attorneys for Creditor Sandra Kelp	
6 7	Matthew W. Grimshaw, Esq. (SBN 210424) GRIMSHAW LAW GROUP, P.C. 26 Executive Park, Ste. 250 Leving, Colifornia 02614	
8	Irvine, California 92614 Telephone: (949) 734-0187 Facsimile: (208) 391-7860	
9	Counsel for Robins Cloud LLP	
11	UNITED STATES BANKRUPTCY COURT	
12	NORTHERN DISTRICT OF CALIFORNIA	
13	SAN FRANCISCO DIVISION	
14		
15	In re) Case No. 19-30088 (DM)
16	PG&E CORPORATION,) Chapter 11
17	and)
18	PACIFIC GAS AND ELECTRIC COMPANY) (Lead Case–Jointly Administered))
19	Debtors)) DECLARATION OF ROBERT
20	Affects:	BRYSON IN SUPPORT OF MOTION FOR ORDER AUTHORIZING WITHDRAWAL OF COUNSEL TO SANDRA KELP
21	:	
22	☐ PG&E Corporation☐ Pacific Gas & Electric Company	
23	Both Debtors))
24)
25	* All papers shall be filed in the Lead Case, No. 19-30088 (DM).	<i>)</i>)
26)
27		
28		1
C:a	Se. 19-30088 DOC# 101625 Artilem (12/14/24)	Alta physician in the control of the physician in the control of t

Case: 19-30088 Doc# 1016 DECTION OF RESPECT REPORT OF 3

Declaration of Robert Bryson 1 2 I, Robert Bryson, say and declare as follows: 3 1. I am an individual over 18 years of age and competent to make this declaration. 4 2. I am an attorney with the law firm of Robins Cloud LP (the "Firm"), attorneys of record for Sandra Kelp ("Creditor"). I am duly admitted to practice law before all courts of the 6 State of California and before this court. 7 3. I make this declaration in support of the Firm's motion to be relieved as counsel to Creditor in the above-captioned bankruptcy case ("Motion"). The facts set forth below are true and within the scope of my personal knowledge, and if called upon to do so I could and would 10 testify competently to these facts. 11 On January 29, 2019, Debtors filed voluntary petitions commencing their 4. 12 bankruptcy cases. 13 In December 2019, the Firm filed Proof of Claim No. 91511 ("Claim") on behalf of Creditor. Since filing the Claim, the Firm has been unable to communicate with Creditor. The 15 Firm has attempted to contact Creditor by telephone, email, and letter, all to no avail. Creditor refuses to speak or otherwise communicate with the Firm. 17 6. The Firm hired a private investigator ("Investigator") to locate Creditor and 18 facilitate communication between the Firm and Creditor. The Investigator failed to locate 19 Creditor. 20 7. The logical inference is that an irreconcilable breakdown in the attorney-client 21 relationship has developed and Creditor no longer desires to be represented by the Firm. 22 8. To the extent that Creditor requests that the Firm turn over any files or information that he is entitled to, the Firm will cooperate and transmit such files. 24 /// 25

26

28

¹ The Firm retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client relationship with Creditor.

9. The Firm will cause the Motion to be served on all of the addresses provided to the Firm by Creditor or procured by the Investigator during his attempts to locate Creditor, including the following: 9000 Steel Canyon Road, Napa, CA 95820 I declare under penalty of perjury that the foregoing is true and correct. Executed on February 5, 2021. Robert Bryson